

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

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In Re:	)	Case No.: 19-05039
Karen E Zwicky	)	
	)	Chapter 13
	)	
Debtor(s).	)	Judge Jacqueline P. Cox

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AMENDED NOTICE OF MOTION

To: Karen E Zwicky, 7911 164th Ct. Tinley Park, IL 60477 *via US Mail*  
Tom Vaughn, Chapter 13 Trustee *notice via ECF delivery system*  
The United States Trustee *notice via ECF delivery system*  
Brenmen Towne Penthouse Association, Po Box 7704, Carol Stream, IL 60197  
*via US Mail*  
Quicken Loans, 635 Woodward Avenue, Detroit, MI, 48226 *via US Mail*  
Codilis and Associates, P.C., Attn: Laura A. Hrisko, 15W030 N. Frontage Road, Suite  
100, Burr Ridge, IL 60527 *via US Mail*  
*See attached service list*

On April 8, 2019 at 10:00 a.m. or soon thereafter as I may be heard, I shall appear before Bankruptcy Judge Jacqueline P. Cox or any other Bankruptcy Judge presiding at 219 South Dearborn, Courtroom 680, Chicago, Illinois 60604, and shall present the MOTION TO USE SELL OR LEASE PROPERTY 363(b) at which time you may appear if so desired.

/s/ David H. Cutler  
David H. Cutler, esq.  
Attorney for Debtor(s)  
Cutler & Associates Ltd.  
4131 Main St.  
Skokie IL 60076  
(847) 673-8600

CERTIFICATE OF SERVICE

The undersigned, an Attorney, does hereby certify that a copy of this Notice and Motion was filed AND sent electronically and via US MAIL to the above captioned by 6:00 p.m. on or before April 2, 2019

/s/ David H. Cutler  
Attorney for Debtor(s)

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AMENDED MOTION TO USE SELL OR LEASE PROPERTY 363(b)

NOW COMES, the Debtor, Karen E Zwicky (hereinafter referred to as “DEBTOR”), by and through her Attorneys, Cutler and Associates, Ltd., and moves this Honorable Court for entry of an Order Authorizing the Debtor to Use Sell or Lease her Real Estate Property, and in support thereof, respectfully represent as follows:

1. On February 27, 2019, the Debtor filed a petition for relief under Chapter 13 of the Bankruptcy Code.
2. Debtors Chapter 13 plan has not yet been confirmed.
3. The proposed plan calls for monthly payments of \$950 per month for 56 months and \$1,318 per month for 4 months with general unsecured creditors receiving 100% of their timely filed or allowed claims.
4. The Debtor wishes to sell her real property located at 7911 164<sup>th</sup> CT., Tinley Park, IL 60477.
5. The Debtor has found a buyer and has entered into a contract for the sale of the Property, the approximate sale price of the property is \$138,900.00. (see Exhibit A)
6. The Debtor’s real estate property is encumbered with a mortgage loan to Quicken Loans in the approximate amount of, \$115,831.18.
7. The automatic stay has not been lifted on the real estate property.

WHEREFORE, DEBTOR prays that this Honorable Court enter an Order Authorizing the Debtor to USE SELL OR LEASE PROPERTY 363(b) located at 7911 164<sup>th</sup> CT., Tinley Park, IL 60477 for the approximate amount of \$138,900.00.

Respectfully submitted,

By: /s/ David H. Cutler

David H. Cutler, esq.  
Attorney for Debtor(s)  
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